

PRIVACY POLICY

(Click on the arrows to expand the headers)

1. Who are we?

Bridgestone Middle East & Africa FZE, a free zone establishment organized and existing under the laws of the United Arab Emirates, with commercial registration number 2420, having its principal place of business at P.O. Box 16813, Tower B Building, 17th Floor, JAFZA One, Jebel Ali, Dubai, UAE (“Bridgestone”, “we”, “us” or “our”), is the data controller for the personal data processing carried out in the Digital Claims Management System (“eClaim”) for purposes of the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data Protection (“UAE PDPL”).

2. What personal data do we process?

Personal data is information that identifies you as an individual, directly, or indirectly when combined with other information. We may interact with you on eClaim in different ways for different reasons, each of which involves the processing of personal data. Certain data are declared by you at your own initiative or at our request, or declared by third parties to which you are related, for instance your employer. Other data are observed data, which we capture from your interactions with eClaim.

3. Purpose and lawful basis of our data processing

The following personal data processing activities take place on eClaim:

PURPOSE	E-claim is an online platform (included web based and mobile application), where our distributors can raise technical claims and Bridgestone approves/rejects based on the provided information in the platform, considering the failure mode, warranty policy etc.
LAWFUL BASIS	Authorized by applicable law
PROCESSING ACTIVITY	<p><u>Business Contact Persons</u></p> <p>When you interact with us on eClaim on behalf of a legal entity (for instance in your capacity of owner, employee or representative of a distributor) most of the data we collect relating to that entity are not personal data.</p> <p>We will collect, however, either directly from you or from the entity you represent, your name and your professional e-mail address.</p> <p>We need your personal data to create an user account, for accounting reference purposes and to be able to contact you as representative of the entity, including in relation to the submission of claims on eClaim. When you contact us for customer support and queries, we process your contact information and your particular request or question.</p> <p>The lawfulness of the processing of your information is authorized by applicable law, to follow up on the claim you have submitted. The provision of your data may also be a requirement from the</p>

	<p>contract we have with the entity you represent. In that capacity, you may be obliged to provide the data as a result of the arrangements you have with the entity, which acts as a data controller in its own right relating to the sharing of your contact information with us.</p> <p>When you/the legal entity that you represent are submitting a product claim on behalf of an end-user who has suffered the product failure, you/the legal entity may provide us with information on the end-user. When you/the entity provide us with such information, you/the entity acts as data controller in its own right relating to the sharing of such information with us. Such end-user data may include</p> <ul style="list-style-type: none"> • name • email address • Vehicle category • Car brand and type • Mileage • Dismounted tyre position
NECESSITY OF PROCESSING	<p>The collected information is necessary to identify who is the claiming party, either on its own behalf, or as the intermediary of the end-user, and to assess whether or not the claim entitles the claimant to receive compensation under our warranty policy.</p>

We shall not collect personal data that are not relevant for the purposes as set out above or otherwise notified to you when we seek your consent for the processing of your personal data.

4. How long do we keep your personal data?

We do not retain the data longer than necessary for our purposes or, as the case may be, for the period as determined in an agreement or by law.

This means that we keep your personal data for a given purpose:

- Account information: as long as you are a distributor/customer of ours and for the further period that we have to retain data to comply with accounting and fiscal data retention laws (5 years in UAE)
- Contact information: if you are our contact person at the Distributor, we keep this information for the purpose of eClaim as long as we retain the data of the Distributor you represent, or until the Distributor has removed you as our contact person.

5. Who are the recipients of your Personal data?

We will disclose your personal data only for the purposes and to the category of recipients as described below. We will take appropriate steps to ensure that your personal data are processed, secured, and transferred according to applicable law.

a. Our authorized personnel

Your personal data are processed by our authorized personnel on a need-to-know basis, and subject to a duty of confidentiality. Data exchanged via eClaim is processed by technical support division for the performance of their duties. Data relating to product claims giving rise to conflicts and legal disputes may be transferred to the Legal department for further processing to defend against any actions to claim rights or legal proceedings.

b. External recipients

We use external companies which service involves the processing of personal data on our behalf. For example, the data we hold are stored/kept by cloud providers based in the European Union.

c. International transfers of Personal data

Your personal data are transferred to Bridgestone in the Dubai Emirate of the UAE, and accessible by our authorized personnel in the UAE.

6. User rights with regard to Personal data

You have specific legal rights relating to the personal data we process relating to you. We will respect your individual rights and will deal with your requests adequately.

The following list contains information on your legal rights which arise from applicable data protection laws:

- **Right to access:** you may ask us information regarding personal data that we hold about you, including information as to which categories of personal data we have in our possession or control, what they are being used for, where we collected them, if not from you directly, and to whom they have been disclosed, if applicable. You may obtain one copy, free of charge, of personal data we hold about you. We reserve the right to charge a reasonable fee for each further copy you may request.
- **Right to rectification:** you may obtain from us rectification of personal data concerning you. We make reasonable efforts to keep personal data in our possession, accurate, complete, current and relevant, based on the most recent information available to us. In appropriate cases, we provide self-service internet portals where users have the possibility to review and rectify their personal data.
- **Right to restriction:** you may obtain from us restriction of processing of your Personal data, if
 - you contest the accuracy of your personal data for the period we need to verify the accuracy,
 - the processing is unlawful and you request the restriction of processing rather than erasure of your personal data,
 - we do no longer need your personal data but you require them for the establishment, exercise or defense of legal claims, or if
 - you object to the processing while we verify whether our legitimate grounds override yours.
- **Right to portability:** At your request, we will transfer your personal data to another controller, where technically feasible, provided that the processing is based on your consent or necessary for the performance of a contract. Rather than receiving a copy of your personal data you may request that we transfer the data to another controller, specified by you, directly.
- **Right to erasure:** you may obtain from us erasure of your personal data, where:
 - the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
 - You have a right to object further processing of your personal data (see below) and execute this right object to the processing;

- the personal data have been unlawfully processed; unless the processing is necessary for compliance with a legal obligation which requires processing from us, in particular for statutory data retention requirements;
 - for the establishment, exercise or defense of legal claims.
- **Right to object:** you may object – at any time – to the processing of your personal data due to your particular situation, provided that the processing is based on our legitimate interests or those of a third party, or the processing concerns our archiving of your purchase history. In these events, we shall no longer process your personal data, however if you object to our processing for which we rely on our legitimate interest, we shall be allowed to continue the processing if we can demonstrate compelling legitimate grounds and an overriding interest for the processing or we further need the data for the establishment, exercise or defense of legal claims. If you object to the processing, please specify whether you wish the erasure of your personal data or the restriction of its processing by us.

We will fulfill your request within four weeks. However, the period may be extended in accordance with applicable laws due to specific reasons relating to the specific legal right or the complexity of your request.

In certain situations we may not be able to give you access to all or some of your personal data due to statutory provisions. If we deny your request for access, we will advise you of the reason for the refusal.

In some cases, we may not be able to clearly identify you on the basis of your personal data due to the identifiers which you provide in your request. In such cases, where we cannot identify you as a data subject, we are not able to comply with your request to execute your legal rights as described in this section, unless you provide additional information enabling Your identification.

7. Contact

In order to exercise your legal rights, please log your request at:

dataprivacyme@bridgestone.ae, or contact us at Bridgestone Middle East & Africa FZE, P.O. Box 16813, Tower B Building, 17th Floor, JAFZA One, Jebel Ali, Dubai, UAE.

8. Complaints

If you believe that the processing of your personal data infringes your statutory rights, you have the right to lodge a complaint with a data protection supervisory authority, in particular in the country of your habitual residence, place of work or place of the alleged infringement.

9. Changes to this Policy

We reserve the right, at our discretion, to modify our privacy practices and update and make changes to this Policy at any time. For this reason, we encourage you to refer to this Policy on an ongoing basis. This Policy is current as of the "last revised" date which appears at the top of this page. We will treat your personal data in a manner consistent with the Policy under which they were collected unless we have your consent to treat them differently.
